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November 13, 2001

Ms. Gloria Blue
Executive Secretary
TPSC
Office of the United States Trade Representative.
600 17th Street, N.W.
Washington, D.C. 20508

Public Version
Confidential business
proprietary information
deleted from brackets [] at
attachment 1.

Re: Inv. No. TA-201-73 (Certain Steel Products)

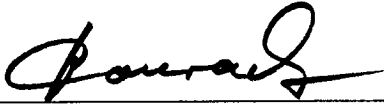
Dear Madam Secretary:

Enclosed please find the exclusion requests regarding **cold rolled sheet and strip other than GOES** submitted on behalf of the Association of Specialty Cold Rolled Strip Producers of Germany, Austria, and Sweden ("SAGA") in the above-referenced investigation. These requests are filed pursuant to the United States Trade Representative's October 26, 2001 Notice in the Federal Register (66 Fed. Reg. 54321).

Proprietary treatment for the information contained in brackets at attachment 1 of the pre-hearing brief has been requested because this information relates to our client's confidential production and sales information and confidential product specifications.

Please do not hesitate to contact us if you have any questions regarding this submission

Respectfully submitted,
BARNES, RICHARDSON & COLBURN

By: 

Gunter von Conrad
Counsel to the
Association of Specialty Cold Rolled Strip Producers of
Germany, Austria, and Sweden

BEFORE THE
TRADE POLICY STAFF COMMITTEE
OFFICE OF THE
UNITED STATES TRADE REPRESENTATIVE
EXECUTIVE OFFICE OF THE PRESIDENT

In the Matter of Potential Action Under Section)
203 of the Trade Act of 1974)
Investigation of)
Certain Steel Products)
_____)

Investigation No. TA-201-73

COMMENTS
of the
ASSOCIATION OF SPECIALTY COLD ROLLED STRIP PRODUCERS
OF GERMANY, AUSTRIA AND SWEDEN ("SAGA")

I. INTRODUCTION

The following comments are filed by leave of the Office of the United States Trade Representative published in 66 Federal Register No. 208 (Friday, October 26, 2001, pp. 54321 et. seq.) on behalf of the members of the Association of Specialty Cold Rolled Strip Producers of Germany, Austria and Sweden ("SAGA"), whose names are set forth in Appendix A to this letter.

II EXCLUSION REQUESTS

Appendix B hereto contains a description of specialty products for which exclusion is requested from import restraining action, if any.

Appendix C hereto contains information on the quantity and value of shipments by

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SAGA members and data relating the totals of such imports by quantity in relation to all imports of subject merchandise in the cold-rolled category.

Several of the products listed have been the subjects of exclusion before, several products are not produced in the United States, and some products, while produced to such or similar appellations either fail to meet quantity or quality requirements, or do not meet specifications required by United States processors or users.

Additional information and views of affected United States companies is expected to be provided directly to USTR.

The supporters of remedies in the United States cold-rolled industry have raised some claims of having the capability or actually producing competitive articles, without, however, producing probative evidence that such claimed products meet the demands of processors or users. In Appendix D, these there are a number of letters and statements from users contradicting such claims.

The following points should have particular consideration, especially where substitutes are asserted by the U.S. domestic industry:

- the fact that in practically all instances, the products of SAGA members oversell domestic cold-rolled products; and
- the fact that the specialty products here involved are produced to ultra-precise specifications with substitutes not being acceptable.

It should also be noted that to the extent the determination of the U.S. International Trade Commission recommends trade limitations based on future production plans, such limitations

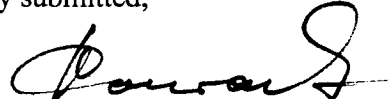
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would be contrary to United States law, because the fair trade Section 201 et. seq. does not contain a "retardation of establishment" criterion as do the unfair trade Antidumping and Countervailing Duty Statutes, as well as contrary to World Trade Organization Rules prohibiting remedy applications which would be without causal link or which would be excessive.

III. CONCLUSION

For the above stated reasons, SAGA requests that the Administration exclude the above-referenced products from any remedy.

Respectfully submitted,

By: 

BARNES, RICHARDSON & COLBURN

Gunter von Conrad
Matthew T. McGrath
Robert A. Shapiro
Counsel for SAGA

Date: November 13, 2001

ATTACHMENT A

Members of the Association of Specialty Cold Rolled Producers of Germany, Austria and Sweden

Wickeder Westfalenstahl GmbH
Postfach 1404
58734 Wickede
GERMANY

Stahlwerk Unna Müller GmbH & Co
Postfach 2055
59410 Unna
GERMANY

Kaltwalzwerk Brookhaus GmbH
Postfach 3220
58821 Plettenberg
GERMANY

Hugo Vogelsang GmbH & Co KG
Postfach 5327
58103 Hagen
GERMANY

Billstein GmbH & Co KG
Postfach 5145
58101 Hagen
GERMANY

J.N. Eberle & Cie GmbH
Postfach 101507
86005 Augsburg
GERMANY

Roechling Kaltwalzwerk KG
Aalener Strasse 62
73447 Oberkochen
GERMANY

C.D. Waelzholz
Postfach 600252
58138 Hagen
GERMANY

Boehler Ybbstal Band GmbH Co KG
Rotte Wuehr, Waidhofner-Str. 3
3333 Boehlerwerk
AUSTRIA

Martin Miller AG
Venus-Berg Strasse 22
3133 Traismauer
AUSTRIA

Uddeholm Strip Steel AB
Uddeholmsvaegen
68428 Munkfors
SWEDEN

ATTACHMENT B

ATTACHMENT B

Following please find a list of the specific products for which SAGA requests exclusion.

Product Designation/Description: See below.

Basis for Request: The list includes an indication of whether, to SAGA's knowledge, the product is not made in the United States or is in short supply from U.S. producers. To SAGA's knowledge, all of these products are either not made in the United States or are in short supply from domestic producers.

Names of Producers: To the extent known, the names of producers are provided.

Total U.S. Consumption: SAGA previously submitted Exclusion Request Data Sheets requested to the United States International Trade Commission containing data on the U.S. imports by each individual firm for each product. However, in many cases, as individual producers, SAGA members do not have information on total U.S. consumption of the individual products or projections of Total U.S. Consumption to 2005. Where a basis for an estimate is available, estimated figures are provided below.

Total U.S Production: Where a basis for an estimate is available, estimated figures are provided below.

Substitute Products: To SAGA's knowledge, there are no substitute products which meet its members' customers' requirements.

Specific Exclusion Requests

1. Special Precision Strip Steel for Doctor Blades for Coating of Paper or for use in the Printing Industry

Special precision strip for the coating of paper and for use in the printing industry. The material is only used for the manufacturing of coater and printing doctor blades used in the paper and printing industry. HTSUS 7211.90.00.00. To SAGA's knowledge, there are only a few producers manufacturing the pre-material. Despite the claims of the domestic industry, to SAGA's knowledge, none of these are U.S. producers. [

]. For further information on this product, see the Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

2. Cold rolled and hardened and tempered strip steel for coater blades

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. [

] See also numbers 1, 3 and 4.

3. Coater Blade Steel

The product is used for industrial knives used in paper coating; HTSUS 7226.99.00. The product is made for the end use specified and has no applications outside that use. Specially developed machinery and devices are used to fulfill the requirements on straightness and edge finish. To SAGA's knowledge, this product is not made in the United States. See also number 1 above.

[

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

4. Doctor Blade Steel for rotogravure and offset printing

This product is used in the production of industrial knives for rotogravure and offset printing (this product, but with a surface plated with nickel phosphorus is already excluded from this investigation). HTSUS 7226.99.00. The product is made for the end use specified and has no applications outside that use. Specially developed machinery and devices are used to fulfill the requirements on heat treatment, straightness and edge finish. See also number 1 above. [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

5. Cold rolled and hardened and tempered strip steel for shock absorber plates

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. Despite claims to the contrary, to SAGA's knowledge, there is no U.S. producer of this product. [

] See also numbers 6 and 15.

6. Shock Absorber Valve Steel for the automotive industry

This product is made for the end use specified and has no applications outside that use. Special developed machinery and devices are used to fulfill the requirements on hardening parameters and surface finish. See also number 5 above. [

].

7. Product 1095 ra greater than or equal to 8, width 24.5".

The product is a cold rolled strip for hardening with special low roughness (bright finish) in hard rolled condition and wide widths. To SAGA's knowledge, there is no U.S. production in these widths nor are there any substitute products. Production requires a wide strip mill, provided by special rolling technology and special grinded work rolls. [

] See also number 5 above.

8. Wood Band Saw Steel

This product is used for manufacturing band saws for wood cutting. Band saws require a high flatness, uniform grain structure and an exact harness of the strip material used. It should be noted that some band saw steel is already excluded from this investigation. However, the definition used is under-inclusive. HTSUS 7226.99.00.00. [

] For further information on this product, see the Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

9. Cold rolled and hardened and tempered strip steel for band saws

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. For this reason, production and availability of this material is very limited in the United States. [] See also number 8 above.

10. Cold rolled and hardened and tempered strip steel for chain saws

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. Despite claims to the contrary, to SAGA's knowledge, there is no U.S. producer of this product. []

11. Cold rolled and hardened and tempered strip steel for circular saws

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. For this reason, production and availability of this material is very limited in the United States. []

12. Product C 125 pin point

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This product is used in the production of various types of saws, especially technical optimizing for hardening of saw teeth. SAGA is aware of some German producers of this product, but to SAGA's knowledge, there is no U.S. production. [

] Please see also numbers 8 and 9 above.

13. Cold rolled and hardened and tempered strip steel for die rules and cutting rules

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. For this reason, production and availability of this material is very limited in the United States. [] See also numbers 18 and 19.

14. Open coil annealed strip (OCA) 1050/1065/1075 - steel rules and die steel

This product is a specialized cold rolled strip with no common name used after hardening in the U.S. by the paper and textile industry for steel rules and die steel. Despite claims to the contrary, to SAGA's knowledge there is no U.S. production capability for open coil annealed strip and no substitute products. [

] Please see also numbers 13, 14, 18 and 19.

15. Valve Steel

This product is used in the manufacturing of compressor valves (air conditioning) and the valves in shock absorbers for the automobile industry. HTSUS 7211.90.00.00. Despite claims to the

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contrary, to SAGA's knowledge, there is no U.S. producer manufacturing strip steel for this specific application. [

] For further information on this product, see the Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

16. Flapper Valve Steel

SAGA believes that this product is already excluded from the investigation. The product is made for the end use specified and has no applications outside that use. Despite claims to the contrary, to SAGA's knowledge, this product is not made in the United States. Specially developed machinery and devices are used to fulfill the necessary requirements for cleanliness and surface finish. The product is a High Carbon Precision Steel [

]

17. Scalpel and Razor Blade Steel

This product is used in the manufacturing of razor blades and for the manufacturing of medical instruments. Despite claims to the contrary, to SAGA's knowledge, there is no U.S. producer manufacturing strip steel for this specific application. [

]

18. Steel Rules

Steel rules are uniquely used for the manufacture of cutting and creasing application in the packaging industry. HTSUS 7217.10.90.00. Steel rules are manufactured from a high carbon strip steel according to the alloy composition [

] To SAGA's knowledge, there is insufficient U.S. production of steel rules with U.S. producers unable to meet the needs of the market. SAGA estimates that U.S. producers can only serve 20-30 percent of the market.. For further information on this product, see the Exclusion Request Date Sheets submitted to the Commission on October 17, 2001. .

19. Rule Die Steel

The material is used for the manufacture of cutting tools for textile and leather (e.g. for car seats, shoes, etc.) HTSUS 7217.10.90.00. [

] For further information on this product, see the Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

20. Bi-Metal Strip

The is a combination of two different steel grades. The material is used for the manufacturing of band saws, hand hack saws, hole saws and reciprocating saws for metal cutting. The product must have tight flatness tolerances, a uniform grain structure, an exact straightness, tight tolerances and a homogeneity of the strip used. The manufacturing process requires special equipment and specific expertise different from the equipment used to produce commodity cold rolled strip steel. HTSUS 7226.92.80.50. [

] Despite claims to the contrary, to SAGA's knowledge, this product is not made in the United States in sufficient volume and specified properties. To SAGA's knowledge, there is only one U.S. producer [] manufacturing bi-metal strip for this specific application and some in house welders. For further information on this product, see the Exclusion request data sheet filed with the Commission on October 17, 2001.

21. Bimetal Strip Steel for the manufacturing of different kinds of heavy duty saws and power saw tool components

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The product is made for the end use specified and has no applications outside that use. HTSUS 7226.99.00. This product is a combination of two different steel grades. Specially developed machinery and devices are used to fulfill requirements on precision welding, flatness, straightness and edge finish. Despite claims to the contrary, to SAGA's knowledge, this product is not made in the United States in sufficient volume and specified properties. See also number 20 above. [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

22. Bimetal Steel Strips for Textile Machine Parts

The product is made for the end use specified and has no applications outside that use. Specially developed machinery and devices are used to fulfill the requirements on precision welding, flatness, straightness and edge finish. Despite claims to the contrary, to SAGA's knowledge, there is no U.S. production with the required quality standard. [

]

23. Texture Rolled Steel Strip (SORBITEX)

SORBITEX is a special texture rolled steel strip. It is a high carbon spring steel with a special grain structure aligned in a certain pattern; HTSUS 7211.29.20.30 and 7211.29.45.00. The product is used to make retractor springs for various products, including seat belts and window blinds. [

] The domestic industry states that the sole U.S. producer, Theis Precision Steel, the U.S. subsidiary of a German company, does not object to exclusion of this product. For further

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information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

24. Cold rolled strip steel for industrial blades

[

] The product is made for the end use specified and has no applications outside that use; HTSUS 7226.92.70.50. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. Despite claims to the contrary, production and availability of this material is very limited in the United States and there are no substitute products. [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001. Based on market experience, SAGA estimates the following for U.S. consumption and production:

]

25. Cold rolled and hardened and tempered strip steel for springs

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. For this reason, production and availability of this material is very limited in the United States. See also number 36. [

]

26. Cold rolled strip steel for trowels - hardened and tempered

The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. Despite claims to the contrary, to SAGA's knowledge, production and availability of this material is very limited in the United States. [

] For further information on this product,

see Exclusion Request Data Sheet submitted to the Commission on October 29, 2001.

27. Cold rolled texture strip steel for retracting springs

[

] HTSUS 7211.29.20.90

and 7211.29.60.80. The product is made for the end use specified and has no applications outside that use. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. For this reason, production and availability of this material is very limited in the United States. The domestic industry states that the sole U.S.

producer, Theis Precision Steel, the U.S. subsidiary of a German company, does not object to exclusion of this product.¹ For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001. See also number 23.

28. Cold rolled strip steel for measuring tapes

[

] The product is made for the end use specified and has no applications outside that use; HTSUS 7211.29.20.90, 7211.29.60.80, 7226.92.50.00 and 7226.92.70.50.. This product requires sophisticated production techniques in the rolling and heat treating of cold-rolled steel. The product also requires very close tolerances in regard to thickness and width as well as exacting metallurgical requirements. Despite claims to the contrary, to SAGA's knowledge, there is no U.S. producer of this product nor are there any substitute products. For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001. Based on market experience, SAGA estimates the following for Total U.S. Consumption:

]

¹ Id. at 10.

29. Certain Alloyed Clutch Spring Steel

This product is used by automotive subcontractors and clutch producers. [

] This is a tailor-made material made to customer specifications and is not produced in the United States. HTSUS 7226.92.80. For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

30. Certain Alloyed Clutch Spring Steel

This product is used by automotive subcontractors and clutch producers. HTSUS 7226.92.50 and 7226.92.80. [

] This is a custom made material produced to customer specification and is not produced in the United States. For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

31. Ski Edge Profile

This product is used by the ski-and snowboard industry. HTSUS 7228.60.80 and 7216.69.00. [

] Despite claims to the contrary, to SAGA's knowledge, there is no U.S. steel mill producing this material. For further information on this product, see Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

32. High Carbon Deep Drawing Steel Alloyed

This product is used in the stamping and tooling industry. This product must have special tolerances with regard to thickness, tensile strength and surface condition. All material is produced to customer specification; HTSUS 7211.29.60, 7226.92.50.. [

] Despite claims to the contrary, to SAGA's knowledge, there is only limited U.S. production of this material. For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

33. Finally Annealed Electrical Steel Strip

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The product is used by the electrical motor industry; HTSUS 7225.19.00 and 7226.19.10. Coated with an insulating laquer modified according to customer's specification. The product has tailor-made insulation and a uniform microstructure which provides good stamping properties, low thickness deviation across the width leading to optimal stacking in the customer's process. [

] There is only limited U.S. production of this product in the United States. For further information on this product, see Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

34. Certain Lapping Carrier Steel

The product is used in the computer industry. HTSUS 7209.17.00, 7225.50.80, 7226.92.50. [

] To SAGA's knowledge, there is no U.S. production of this product according to these specifications. For further information on this product, see Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

35. Certain Lapping Carrier Steel

The product is used in the manufacture of special carriers for semi-conductor lapping. The product is made for the end use specified and has no applications outside that use. Despite claims to the contrary, to SAGA's knowledge, the product is not made in the United States. Specially developed machinery and devices are used to fulfill requirements on precision flatness. [

]

36. High Precision Spring Steels

This product is used for critical parts like dynamically loaded components, helical springs, etc. HTSUS 7226.99.00. The product is made for the end use specified and has no applications outside that use. Despite claims to the contrary, to SAGA's knowledge, the product is not made in the United States. Specially developed machinery and devices are used to fulfill requirements on

microstructure, precision flatness, and edge finish. [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

37. Feeler Gauge Steel

This product is a cold-rolled hardened and tempered strip steel for measurement gauges and devices; HTSUS 7211.90.00. Due to the very narrow width specification this product was previously excluded from antidumping and countervailing duty orders. The product is made for the end use specified and has no applications outside that use. Specially developed machinery and equipment are used to fulfill the requirements on very narrow thickness tolerances, precision flatness, surface and edge finish. To SAGA's knowledge, the product is not made in the United States in the thin sizes [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

38. Reed Steel

This product is used in the manufacture of filter webs, textile webs, and technical webs of the finest mesh standards, glass, steel wire, synthetics, carbonfiberwebs, carrier lattices for microelectronic components; HTSUS 7211.90.00. The products is made for the end use specified and has no applications outside that use. Specially developed machinery and devices are used to fulfill requirements on straightness, accurate width tolerances and precision edge finish. Due to the very narrow width specification this product was previously excluded from antidumping and countervailing duty orders. Despite claims to the contrary, to SAGA's knowledge, the product in not made in the United States. [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001.

39. Bonderband

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Band, phosphated on one side only, used in production of needle bearings. HTSUS 7226.99.00.00 and 7212.50.00.00. The band, phosphated on one side only, provides numerous advantages to producers of needle bearings. To SAGA's knowledge, this product is not made in the United States. Qualities MRS 4/43; C15M; 16MnCr5M. Phosphated and soaped surface; extremely low stretch limits and toughness through special heat treatment. The technological property "band phosphated on one side only" is inclusive to and important to the product description. The domestic industry does not identify and U.S. producers and states that if the product description requires that the steel be band phosphated on one side only, they are not capable of producing the product. For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001. []

40. Blank band

This product is used in the automobile industry for the production of a specialty product for motor controls; HTSUS 7226.92.80.50. While the domestic industry claims that Blair produces the three grades 16MnCr5, 16MnCr5M, and 16MnCr5M2, []

] For

further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 17, 2001. []

41. Product 1075 T5 Tol. And better, 24.5 inch width

This product is used in the production of special parts (precision stamping) for the automotive industry and requires exact dimension.. To SAGA's knowledge, there is no U.S. production in these widths and no substitute products. []

42. Product 1095 T5 Tol. And better 24.5 inch width

This product is used in the production of special parts (precision stamping) for the automotive industry and requires exact dimension.. To SAGA's knowledge, there is no U.S. production in these

widths. [

]

43. Certain cold-rolled hardened and tempered strip steel

Examples of this product are cold rolled white and bluepolished strip for the automotive industry and cold rolled white polished strip steel for the tool industry. The hardening and tempering is a subsequent heat-treatment of the cold-rolled strip steel which is followed by an additional surface treatment as white and color polishing or grinding. Such finishes are mainly used in the tool and automobile industries. To SAGA's knowledge, there is limited production of hardened strip steel in the United States and the U.S. industry does not manufacture such steel with special finishes. [

]

44. Cold Rolled Steel Strip - SAE 1074 modified

This product is used for the production of racing bearing shells/cages and other bearing shells/cages; HTSUS 7226.92.80.50. [

For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 29, 2001.

45. Cold Rolled Steel Strip - SAE 1065 modified

The product has a modified analysis and extremely tight tolerances for various end-uses, rolled to special temper. HTSUS 7226.92.80.50. [

For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 29, 2001.

46. Cold Rolled Steel Strip - SAE 1045 modified

The product has a modified analysis - [] - and special rough surface for the production of high quality deep drawn toe caps; HTSUS 7225.50.80.85 and 7226.92.80.50.. [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 29, 2001.

47. Cold Rolled Steel Strip - SAE 1006 modified

This special grade was developed for the end use which is valves (in airconditioning systems); HTSUS 7225.50.80.85, 7226.92.50.00, and 7226.92.80.50. Modified analysis - [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 29, 2001.

48. Cold Rolled Steel Strip - SAE 1008 modified

HTSUS 7211.23.20.00. Modified analysis - [

] For further information on this product, see Exclusion Request Date Sheet submitted to the Commission on October 29, 2001.

49. Crystal saws and surry blade steel for semiconductor industries

This products is for the semiconductor industry and is used in crystal cutting. The product is made for the end use specified and has no applications outside that use. Despite claims to the contrary, to SAGA's knowledge, the product is not made in the United States. Specially developed machinery and devices are used to fulfill the requirements on precision straightness and edge finish. [

]

50. Steel for textile machine parts

The products is made for the end use specified and has no applications outside that use. To SAGA's knowledge, the product is not made in the United States for the required quality standard. Specially developed machinery and devices are used to fulfill requirements on thickness tolerances, precision flatness and edge finish. [

]

51. Crepping Blade Steel

The product is used for industrial knives used in paper crepping machinery. The product is made for the end use specified and has no applications outside that use. Despite claims to the contrary, To SAGA's knowledge, the product is not made in the United States. Specially developed machinery and devices are used to fulfill the requirements on precision flatness, straightness, and edge finish. [

]

52. Trimetal Strip Steel

The products is three strip materials, stainless strip steels and non iron materials are beam welded together) for critical resistor components in communication devices. The product is made for the end use specified and has no applications outside that use. Despite claims to the contrary, to SAGA's knowledge, the product is not made in sufficient quantities in the United States to satisfy demand. Specially developed machinery and devices are used to fulfill requirements on precision welding, flatness, straightness and accurate edge finish. [

]

53. Band Knife Steel

The product is used for industrial blades used in bread slicing. HTSUS 7226.99.00. The product is made for the end use specified and has no applications outside that use. To SAGA's knowledge,

PUBLIC VERSION

the product is not made in the United States. Due to the very narrow width specification, this product was previously excluded from antidumping and countervailing duty. Specially developed machinery and devices are used to fulfill requirements on straightness and edge finish. [

] For further information on this product, see Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

54. Flat Wire

A tailor-made product produced to customer specifications. The product is used in the automotive industry by retaining ring and hose claim producers. [

] For further information on this product, see Exclusion Request Data Sheet submitted to the Commission on October 17, 2001.

55. Cold Rolled Steel Strip to SAE 4130

This product is used for the production of scrapers and similar hardware; HTSUS 7226.92.80.50. [

] For further information on this product, see Exclusion Request Data Sheet submitted to the Commission on October 29, 2001.

56. Cold Rolled Steel Strip for Production of Scrapers and Similar Hardware

This product is required where good surface condition and consistency in hardness and mechanicals are essential; HTSUS 7226.92.80.50.. [

] For further information on this product, see Exclusion Request Data Sheet submitted to the Commission on October 29, 2001.

57. 2% Nickel T5 Tolerances and ra less than 8 my

To SAGA's knowledge, there are no U.S. producers of this product. [

]

ATTACHMENT C

CANNOT BE PUBLICLY SUMMARIZED

ATTACHMENT D

PACIFIC/HOE

PACIFIC/HOE SAW AND KNIFE COMPANY

2700 S.E. Tacoma St., P.O. Box 82155
Portland, Oregon 97282-0155 U.S.A.
503/234-9501, FAX 503/234-2308
sales@pacific-hoe.com

October 31, 2001

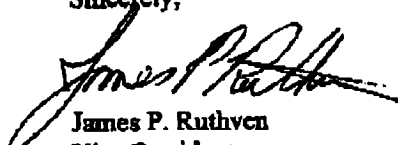
United States International Trade Commission
Washington, DC 20436

Dear Commission:

We are a manufacturer of bandsaw blades used in the lumber manufacturing industry. We are the largest manufacturer of these saws in the United States. We have been manufacturing this product for over one hundred years. Extremely high quality bandsaw strip steel is used to make these blades. Specifications and tolerances are very exact for this steel. We import this raw material from Europe and Japan. There is no US Company that manufactures the strip bandsaw steel we use. Placing a duty on this material will greatly damage our company. Competition from Canadian manufacturers has hurt our business over the last three years. Canadian companies have a huge cost advantage with the low Canadian Dollar. The strong US Dollar has made it difficult enough to compete. A duty on the raw material would make our product uncompetitive with blades made in Canada where there is no duty. Profit margins on the blades are very small. A duty on this steel could put us out of the bandsaw manufacturing business.

We request that you consider the fact that there is no US manufacturer of bandsaw strip steel and the damage a duty on the product would do to domestic bandsaw manufacturers. We request that you exclude this raw material from any duties that may be established by this investigation.

Sincerely,



James P. Ruthven
Vice President

PACIFIC/HOE

PACIFIC/HOE SAW AND KNIFE COMPANY

2700 S.E. Tacoma St., P.O. Box 82155
Portland, Oregon 97282-0155 U.S.A
503/234-9501, FAX 503/234-2308
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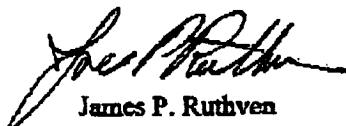
United States International Trade Commission
Washington, DC 20436

Dear Commission:

We are a manufacturer of coater blades used in the paper manufacturing industry. We are the largest manufacturer of these blades in the United States. We have been manufacturing this product for over forty years. A very high quality steel raw material is essential for the manufacture of this product. We import this raw material from Europe. The material is Polished Blue Steel/SAE 1095 Strip Steel. There is no US Company that manufactures this steel. Placing a duty on this material will greatly damage our company. We will not be able to compete with foreign manufacturers of the finished blade. The strong US dollar has made it difficult enough to compete. A duty on the raw material would price our product out of the market and could ultimately close our Coater Blade Division.

We request that you consider the fact that there is no US manufacturer of this material and the damage a duty on the product would do to domestic coater blade manufacturers. We request that you exclude this raw material from any duties that may be established by this investigation.

Sincerely,



James P. Ruthven
Vice President

18568299303

11/07/2001 18:15 FAX 18568299303

DU-MOR GROUP

001

DU-MOR BLADE CO.

DOCTOR AND COATER BLADE SPECIALISTS

International Trade Commission

INCORPORATED 1968

November 5, 2001

To whom it may concern;

We at Du-Mor Blade Co. over our 35 years of producing quality Doctor and Coater blades, have exhausted all Domestic sources for 1095 carbon steel, such as Theis Wallace Barnes, National Steel Service, Thompson Steel, Fox Valley and Nedwick Steel (American Steel Works).

Surface finish, blueing, hardness, width, camber and flatness were always outside of our specifications. All of these trials contained huge quantities of rejections, upwards from 80 to 90%, some were even received completely rusted. These trials cost our company thousands of dollars in production time, with absolutely no good results.

Common sense suggests that it would be more cost effective to buy from a domestic source, which would not be cheaper, but we would not have to deal with the long lead times and the problem of inventorying huge quantities of steel in our facility, but the fact of the matter is, that the U.S. suppliers have inconsistent that is more often bordering on poor to totally unuseable for our applications.

For Example: Attached please find paperwork of the previously mentioned "RUST" rejections from Thompson Steel.

In addition, if the American Steel manufacturers had a viable product of which we could use to manufacture our coater and doctor blades, why have they not contacted Du-Mor for business, etc.

Please feel free to contact me with any questions or further information required to help bring this matter to a conclusion.

Sincerely,


H. Christopher Morris

V.P. Manufacturing & Quality Control

HCM/ko
enclosures

11/07/01

20:07

THOMAS E COSTELLO-SALES AGENT → +49 2334 862015

NO. 339

002

11/07/2001 18:15 FAX 18588299303

DU-MOR GROUP

002

DU-MOR BLADE CO.

DOCTOR AND COATER BLADE SPECIALISTS

Thompson Steel Company
Mr. Ed Ryan
120 Royall Street
Canton, MA. 02021

August 22, 1995

Dear Mr. Ryan;

As per our phone conversation, I have enclosed photo's taken of the material we received 8-21-95. This was our Purchase Order # 48761 for 5000 lbs. .015 x 84MM Pol. Blue 1095 Coater Blade Steel.

We feel there is no need to send you a sample due to the severity of the rust. This material needs to be oiled well and each coil needs to be protected. These coils are destroying each other due to the metal strapping material and there is not enough cardboard between each coil to protect their edge.

Please notify me with a return authorization no.-so we can remove this material from our facility. Thank you.

Sincerely;


Elaine Morris-Eckenhoff
V.P.

EME/ee
enclosures
cc: Tom Knudsen

TOTAL P.01



U.S. BLADE Manufacturing Co. INC.

90 MYRTLE STREET • CRANFORD, NEW JERSEY 07016-3236
(908) 272-2898 • FAX (908) 272-2717 • 1 800-BLADE US

October 29, 2001

Ms. Diane Mazur
Investigator
United States International Trade Commission
500 East Street
Washington, DC 20436

RE: 201 on Steel Inv. No. 201-73 Certain Steel Products Category 4, Cold-Rolled Steel Exclusion Request
for Industrial Blades

Dear Ms. Mazur:

We are purchasers of cold-rolled steel suitable for the production of "industrial blades." We have noted both the above-referenced exclusion request by the Association of Specialty Cold-Rolled Strip Producers of Germany, Austria and Sweden (SAGA) and the comments with regard thereto filed by the law firm of Adduci, Mastriani and Schaumburg under the date of September 11, 2001. We are writing to stress our support of the exclusion request of SAGA for the following reasons:

We have sought to purchase 1095 cold-rolled steel suitable for our production of industrial blades (industrial razor blades), but have been unable to obtain satisfactory quality of 1095 cold-rolled steel manufactured in the United States.

In particular, we believe that American Steel Works (and its related company Nedwick Steel) does not produce (manufacture) this grade of material, but is engaged in hardening and tempering of steel. 1095 cold-rolled steel offered by them to industrial blade manufacturers are of offshore origin, not manufactured in U.S.

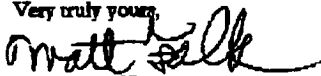
Similarly, Blue Blade Steel Co. is likewise, not a manufacturer/producer of cold-rolled steel, but rather primarily a heat treating company. 1095 cold-rolled steel they may offer to sell to industrial blade manufacturers are also of offshore origin, not U.S. produced.

With regard to Thompson, they do have cold-rolling facilities, but do not offer/have not produced the specific qualities we require of our 1095 cold-rolled steel.

Lastly, Thies Precision, (a subsidiary of a German company) has not provided sufficient surface quality for our needs. We are further informed that other American (U.S.) companies producing industrial blades have met similar results and quality problems from the above-referenced companies.

In light of the foregoing, we urge that the exclusion request be granted, since we would lose our sources of acceptable quality supply, which would adversely affect our business and lower quality standards for products we provide to our industrial blade customers.

Very truly yours,



Matt Falk, V.P.
U.S. Blade Mfg. Co., Inc.

Post Office Box 788
Dorhington, SC 29333-0788



2991 South Pine Street
Spartanburg, SC 29302

Phone: 864 - 585-8292
Fax: 864 - 583-6958

E-Mail: Lire1918@AOL.com
<http://www.liberty-reed.com>

USITC
500 E. Street S.W.
Washington, D.C. 20436

October 31, 2001

RE: Cold Rolled Precision Strip Steel
Safeguard Investigation TA 201-73

Liberty Reed Company, Inc. is the only manufacturer of reeds for the Forming Fabrics, Wet and Dryer Felts in the United States. We are a tool maker for this type of production of filters used in the Paper industry. The product woven is very sensitive, as no scraping is allowed when this product is woven. These reeds can only use high quality reed steel, as the thickness and width tolerances, straightness, surface finish and accurate flatness must meet a certain tolerance. A reed that is 12000 mm long and longer usually has in excess of 48000 pieces of reed steel.

Since Liberty Reed started this production, we have always tried to find domestic suppliers. But unfortunately they are often unable to meet the strict tolerance requirement that is needed for this product. Since our customers are weaving the screens out of monofilament it is very important to have rounded edges on the steel.

For better understanding, we have enclosed a brochure from one of our suppliers. At this time there are only two suppliers worldwide that can produce reed steel, one is located in Sweden, the other in Germany.

We have heard that the US Steel Industry is concerned of "price dumping" and asking for additional duty charges for this material. This action would cause a lot of difficulties for Liberty Reed Co., as we export our reeds worldwide. We would have to increase our prices and therefore eliminate any possibility to export due to higher prices.

Enclosed is a letter from one of our suppliers. This really proves that the reed steel can not be produced to the necessary specifications. Another handicap for making this type of reed steel is that the quantities of the different sizes are not very big. We buy about 100 -- 500 pounds of the different thickness sizes and widths.

If you need more information on reed steel please feel free to contact me. We are prepared to discuss this concern with the commission.

Sincerely,

Ted Wagner
President, Liberty Reed Co., Inc.

Enclosures

300 Broad Street
Bristol, CT 06010-8850
Tel. (860) 585-6610 Fax: (860) 589-7411



February 3, 2000

Liberty Reed Co.
P.O. Box 18277
2991 S. Pine Street
Spartanburg, SC 39302

Attention: Curt Wagner

Dear Curt:

After a thorough review of our process and capabilities of producing the reed steel material we supply to you, we regret to have to inform you that we can no longer partake in this business.

These items are time consuming, and we simply do not have the equipment to manufacture this steel to your quality standards.

Unfortunately, our lead times have extended to 14-16 weeks on this type of material. We also have increased our minimum order quantity requirement to 5,000 pounds per thickness.

We do not like to turn away any business but after reviewing our capacity and capability, we must. We wish you much success and if things should change in the future we will contact you.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Fedc".

Sharon Fedc
Inside Sales Representative

cc: Joe Sjogren
Jack Schmidt

DU-MOR BLADE CO.**DOCTOR AND COATER BLADE SPECIALISTS**

International Trade Commission

INCORPORATED 1966



November 5, 2001

To whom it may concern;

Tax info
to: Barnes, Richardson
from: Eberle

We at Du-Mor Blade Co. over our 35 years of producing quality Doctor and Coater blades, have exhausted all Domestic sources for 1095 carbon steel, such as Theis Wallace Barnes, National Steel Service, Thompson Steel, Fox Valley and Nedwick Steel (American Steel Works). *Nov 13, 01*

Surface finish, blueing, hardness, width, camber and flatness were always outside of our specifications. All of these trials contained huge quantities of rejections, upwards from 80 to 90%, some were even received completely rusted. These trials cost our company thousands of dollars in production time, with absolutely no good results.

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Sincerely,

H. Christopher Morris

V.P. - Manufacturing & Quality Control

HCM/ko

enclosures

DU-MOR BLADE CO.

DOCTOR AND COATER BLADE SPECIALISTS



Thompson Steel Company
Mr. Ed Ryan
120 Royall Street
Canton, MA. 02021

August 22, 1995

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Please notify me with a return authorization no.-so we can remove this material from our facility. Thank you.

Sincerely;


Elaine Morris-Eckenhoff
V.P.

EME/ee
enclosures
cc: Tom Knudsen